

Donaldson & Chilliast, LLP
1825 Park Avenue, Suite 1102
New York, NY 10035
212-722-4900
212-722-4966
XDonaldson@aol.com

November 9, 2020

Via ECF

Hon. Edgardo Ramos
United States District Court Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

MEMO ENDORSED, last page.

Re: *United States v. Adrean Coombs*
20 Cr 481 (ER)

Judge Ramos,

As the Court is aware, I was assigned to represent Mr. Coombs in the above related matter. On September 23, 2020, after a detention hearing before Magistrate Judge Netburn, Mr. Coombs was ordered detained pending trial. With the Government's consent, we are respectfully asking the Court to enter an Order modifying Mr. Coombs detention status to the following: (1) Home incarceration enforced by GPS monitoring (pretrial services prefers location monitoring as directed by PTS); (2) \$25,000.00 PRB cosigned by 1 FRP (one week to meet this condition); (3) mandatory mental health evaluation and treatment as directed by PTS; (4) Drug testing and treatment as directed by PTS; (5) Surrender passport and no new applications; (6) Travel restricted to SDNY/EDNY; (7) Mr. Coombs not to possess a firearm or other destructive device; and (8) reside at address approved by PTS and not relocate without prior approval; (9) reside at such address only with co-occupants approved in advance by PTS; and (10) no contact with codefendants outside the presence of counsel.

PTS has advised that it continues to recommend detention in this case. It is our understanding that while the Government initially sought detention in this matter, the Government will consent to the above conditions in light of, among other things, Magistrate Judge Netburn's order that the parties confer and consider treatment alternatives. The Government further agrees that to the extent bail is granted by this Court, Mr. Coombs may be released on his own signature and permitted to self-install any home monitoring unit under the

direction and instruction of PTS. All other conditions must be met within one (1) week of the entry of this Order.

Sincerely,

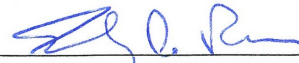
/s/ **Xavier R. Donaldson**

Xavier R. Donaldson

Mr. Coombs' terms of release are as follows: (1) Home incarceration with location monitoring as directed by Pretrial Services; (2) \$25,000.00 PRB cosigned by 1 FRP (one week to meet this condition); (3) mandatory mental health evaluation and treatment as directed by PTS; (4) Drug testing and treatment as directed by PTS; (5) Surrender passport and no new applications; (6) Travel restricted to SDNY/EDNY; (7) Mr. Coombs shall not possess a firearm or other destructive device; and (8) reside at address approved by PTS and not relocate without prior approval; (9) reside at such address only with co-occupants approved in advance by PTS; and (10) no contact with co-defendants outside the presence of counsel. Mr. Coombs may be released on his own signature and permitted to self-install any home monitoring unit under the direction and instruction of PTS. All other conditions must be met within one (1) week of the entry of this Order.

Upon release, Mr. Coombs shall report to the Pretrial Services Office where an ankle monitor will be placed on him. If he is released after business hours, then he directed to arrive at the Pretrial Services Office at 8:30 a.m. the following business day.

SO ORDERED.



Edgardo Ramos, U.S.D.J

Dated: 11/17/2020

New York, New York